

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

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Roy Romer
Governor

Thomas M. Vernon, M.D.
Executive Director

December 20, 1990

Mr. Robert M. Nelson, Jr.
Manager
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Mr. James O. Zane
Manager
E.G. & G. Rocky Flats, Inc.
P.O. Box 464
Golden, Colorado 80402-0464

Dear Mssrs. Nelson and Zane,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the Responsiveness Summary (RS) for comments to the Proposed Surface Water IM/IRA for the 903 Pad, Mound, and East Trenches (OU 2) Decision Document. The RS does a good job of responding to the major concerns of the public and the regulatory agencies. However, the Division has attached some comments for additional clarification on particular items.

Based upon Corrective Action protocols and on the comments within the RS, the Division recommends a new and separate interim measure (IM/IRA) be instigated to address the collection, transportation, treatment, and disposal of the contaminated water emerging from seeps associated with the 903 Pad, but within the Woman Creek drainage basin. This would allow the remaining portion of the original IM/IRA consisting of the Walnut Creek drainage basin seeps to proceed as scheduled and avoid the complications that amendments or addenda to the original plan would create.

As soon as DOE generates a work schedule for this new IM/IRA, please forward it to the regulatory agencies. To be able to benefit from the increased flows from these seeps in the spring, a schedule needs to be in place very soon.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman". The signature is written in dark ink and is positioned above the typed name.

Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Martin Hestmark, EPA
Scott Grace, DOE
Fraser Lockhart, DOE
Tom Greengard, EG&G
Jeb Love, RFPU

Comments to the Responsiveness Summary for the 903 Pad, Mound, and East Trenches (OU 2) IM/IRA Plan and Decision Document, December, 1990:

Comment 17: While the Division understands the logistical problems associated with effluent sampling, there is no clear explanation of how RFP intends to address the concern, raised numerous times within these comments, that effluent quality needs to be measured before the treated water is allowed to be released. There have been several ideas discussed that would accomplish this, some more feasible than others. However, within the final document, there must be a discussion of how RFP intends to make this water quality determination.

Comment 90: The response given in Comment 136 does not address the reason that Comment 90 was written. "Base Flow" is a confusing concept to a non-technical reader and misconceptions can result when considering storm events and/or excess flow. The decision to limit capacity of the treatment facility to the base flow was made in inter-agency meetings and the public is not privy to our rationale. Therefore, please explain why the decision was made and what the ramifications of that decision will be.

Comment 91: The Division sympathizes with DOE's reluctance to include design quality diagrams within this IM/IRA because of the possible confusion that could arise if, at any time in the future, these designs need to be changed. However, some sort of diagram would help the reader visualize the system and aid understanding of the IM/IRA Plan. Maybe schematics of a typical seep collection could be included or diagrams that are clearly labelled "proposed."

General: The Division supports the concept of instigating a new interim measure to collect, transport, treat, and dispose of the water in the Woman Creek drainage basin seeps. This new IM/IRA will remove the concerns of inter-basin transfer of treated water and the lack of bench-scale treatability tests for the radioactive constituents within the water in these seeps as well as allow time to formulate a better transportation plan.

General: A correction letter was faxed and sent by letter to DOE on December 20, 1990, concerning comments 98 and 99. The correction was considered in the response to comment 98, but was not considered for 99. Please refer to that correction letter for a revised Comment 99.